

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CHARLES LANGONE, as FUND MANAGER
of the NEW ENGLAND TEAMSTERS AND
TRUCKING INDUSTRY PENSION FUND

Plaintiff,

v.

STAMPRETE OF RHODE ISLAND, STAMP
CRETE OF RHODE ISLAND, INC.
AND STAMPED CONCRETE, INC.

Defendant,

C.A. No. 04cv11125 NG

**MOTION TO EXTEND THE TIME FOR FILING SUMMARY JUDGMENT
MOTIONS**

NOW COME the parties in the above named matter and request an extension of the time for filing summary judgment motions from February 28, 2006 to March 28, 2006. The extension is required in order for the Defendant to provide supplemental discovery to the Plaintiff as previously ordered by this court. Defendant has agreed to provide the requested items as soon as it is available from his client. Plaintiff states that additional time is necessary so that it can review the outstanding items and incorporate them into a summary judgment motion.

For the Plaintiff,

CHARLES LANGONE, as FUND MANAGER
Of the NEW ENGLAND TEAMSTERS AND
TRUCKING INDUSTRY PENSION FUND,

By his Attorney,

/S/ Renee J. Bushey

Renee J. Bushey, BBO # 629444
Catherine M. Campbell, BBO #549397
Feinberg, Campbell & Zack, P.C.
177 Milk Street
Boston, MA 02109
(617) 338-1976

Dated: February 13, 2006

For the Defendants,

STAMPRETE OF RHODE ISLAND,
STAMP CRETE of RHODE
ISLAND, INC., and
STAMPED CONCRETE, INC.
By their Attorney,

/S/ Bruce E. Thompson

Bruce E. Thompson, Esq.
Casey and Thompson, PC
8 North Main Street, Suite 204
Attleboro, MA 02703
(508) 222-2332

Dated: February 13, 2006